

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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ROBERT GLUCK, EMMA GLUCK and SARA  
GLUCK, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

vs.

HECLA MINING COMPANY, PHILLIPS S.  
BAKER, JR., LINDSAY A. HALL,  
LAWRENCE P. RADFORD, and DEAN  
W.A. MCDONALD,

Defendants.

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Case No.: 19-cv-4883 (ALC)

CLASS ACTION

JURY TRIAL DEMANDED

**STIPULATION REGARDING VOLUNTARY DISMISSAL OF  
DEFENDANT DEAN W.A. MCDONALD**

WHEREAS, on September 9, 2020, Lead Plaintiffs filed the Consolidated Class Action Complaint for Violations of Federal Securities Laws (“Complaint”) (ECF No. 86);

WHEREAS, on September 18, 2020, the Court entered the parties’ stipulated briefing schedule concerning Defendants’ anticipated motion to dismiss the Complaint (ECF No. 90), which provided for Defendants’ motion to dismiss to be filed on or before December 9, 2020;

WHEREAS, on October 5, 2020, Defendant Dean W.A. McDonald (“McDonald”) was served with a summons and the Complaint (ECF No. 91);

WHEREAS, Defendants have informed Lead Plaintiffs’ counsel that the statement alleged in paragraph 111 of the Complaint, which is alleged to have been made by Defendant McDonald, was, in fact, made by Defendant Phillips S. Baker (“Baker”);

WHEREAS, Lead Plaintiffs’ counsel and Defendants’ counsel have met and conferred concerning the allegation in paragraph 111 of the Complaint and have exchanged certain information concerning that statement;

WHEREAS, the statement alleged in paragraph 111 of the Complaint is the only statement alleged in the Complaint to have been made by Defendant McDonald;

NOW, THEREFORE, IT IS HEREBY STIPULATED, AS FOLLOWS:

1. The parties agree that the statement alleged in paragraph 111 of the Complaint was made by Defendant Baker; and

2. Lead Plaintiffs voluntarily dismiss Defendant McDonald under Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure without prejudice, with each side bearing its own costs.

Dated: December 3, 2020

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